

EXHIBIT 3

November 17, 2020

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Page 1

1 - STUART VARDAMAN -

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 ----- X
5 ULKU ROWE,

6 Plaintiff,

7 Case No.
8 19 Civ. 08655(LGS)(GWG)

9 v.

10 GOOGLE LLC

11 Defendant.

12 ----- X

13 DATE: November 17, 2020

14 TIME: 9:37 a.m.

15 VIDEOTAPED VIDEOCONFERENCE DEPOSITION

16 OF STUART VARDAMAN, held via Zoom, pursuant to ^

17 Notice, before Hope Menaker, a Shorthand Reporter

18 and Notary Public of the State of New York.

<p style="text-align: right;">Page 42</p> <p>1 - STUART VARDAMAN -</p> <p>2 her background was?</p> <p>3 A. Not that I recall. I think it was</p> <p>4 known that she had an industry background.</p> <p>5 Q. What did you know about her industry</p> <p>6 background?</p> <p>7 A. I think that she was at JPM. Yeah,</p> <p>8 that's pretty much it.</p> <p>9 Q. That's pretty much all you knew about</p> <p>10 her background?</p> <p>11 A. Correct.</p> <p>12 Q. Do you know what role she had at</p> <p>13 JPM?</p> <p>14 A. No, not that I recall.</p> <p>15 Q. Do you know how many years she had in</p> <p>16 the financial services industry?</p> <p>17 A. Not -- no, not that I recall.</p> <p>18 Q. Do you know what her technological</p> <p>19 background was, her technology background?</p> <p>20 A. No.</p> <p>21 Q. Do you know what advanced degrees she</p> <p>22 had?</p> <p>23 A. I don't recall --</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. -- ma'am.</p>	<p style="text-align: right;">Page 44</p> <p>1 - STUART VARDAMAN -</p> <p>2 conversation early on where I highlighted the</p> <p>3 process and that we were putting her in process</p> <p>4 and I'm -- I'm -- over the course of that</p> <p>5 conversation, yeah, we may have spent some time on</p> <p>6 her background.</p> <p>7 Q. Are you referring to a conversation</p> <p>8 you had with Ms. Rowe?</p> <p>9 A. Yeah.</p> <p>10 Q. When was that conversation?</p> <p>11 A. Oh, goodness. It would have been</p> <p>12 after Tariq asked our team to put her in process</p> <p>13 for the head of financial services.</p> <p>14 Q. Please tell me everything you recall</p> <p>15 about that conversation.</p> <p>16 A. Given she was a Googler, I wanted to</p> <p>17 share with her the process that we were running</p> <p>18 and we spent some time talking about her</p> <p>19 background as a means to spend a few minutes,</p> <p>20 quote/unquote, getting to know each other.</p> <p>21 Q. What did you discuss about her</p> <p>22 background?</p> <p>23 A. I don't recall. It was quite some</p> <p>24 time ago.</p> <p>25 Q. How long did that conversation last?</p>
<p style="text-align: right;">Page 43</p> <p>1 - STUART VARDAMAN -</p> <p>2 Q. Did you know --</p> <p>3 A. I was asked to put her in process and</p> <p>4 I did.</p> <p>5 Q. Okay. I'm asking: At any point in</p> <p>6 time, did you learn what her qualifications were?</p> <p>7 A. No.</p> <p>8 Q. At any point in time, did you learn</p> <p>9 what her industry background was beyond the fact</p> <p>10 that she worked at JPM?</p> <p>11 A. At any point in time?</p> <p>12 Q. Yes.</p> <p>13 A. No.</p> <p>14 Q. At any point in time, did you learn</p> <p>15 what her management background was managing teams?</p> <p>16 A. No.</p> <p>17 Q. At any point in time, did you learn</p> <p>18 what advanced degrees she had?</p> <p>19 A. You already asked that question.</p> <p>20 Q. I'm asking now at any point in time.</p> <p>21 A. No, I didn't spend time on it.</p> <p>22 Q. At any point in time, did you do</p> <p>23 anything to educate yourself about her</p> <p>24 qualifications for the role?</p> <p>25 A. Ma'am, you know, we may have had -- a</p>	<p style="text-align: right;">Page 45</p> <p>1 - STUART VARDAMAN -</p> <p>2 A. I -- I can't say for sure.</p> <p>3 Q. Was it more than five minutes?</p> <p>4 A. I'm sorry, did you say more than five</p> <p>5 minutes?</p> <p>6 Q. Yes.</p> <p>7 A. Yes, for -- for sure.</p> <p>8 Q. Was it more than fifteen minutes?</p> <p>9 A. If I think about conversations like</p> <p>10 that it probably would have clocked in at about</p> <p>11 forty-five minutes, but again I can't state for</p> <p>12 sure.</p> <p>13 Q. At any point in time, did you review</p> <p>14 Ms. Rowe's resume?</p> <p>15 A. I don't remember.</p> <p>16 Q. At any point in time, did you review</p> <p>17 Ms. Rowe's LinkedIn profile?</p> <p>18 A. I'm sure I would have come across it,</p> <p>19 yeah.</p> <p>20 Q. Do you recall whether you reviewed</p> <p>21 it?</p> <p>22 A. Reviewing and looking at it, yeah,</p> <p>23 probably.</p> <p>24 Q. I'm asking if you have an independent</p> <p>25 recollection of actually viewing it or just you</p>

<p style="text-align: right;">Page 46</p> <p>1 - STUART VARDAMAN -</p> <p>2 are assuming you would have.</p> <p>3 A. I'm assuming that I would have.</p> <p>4 Q. Do you recall anything else with</p> <p>5 respect to the conversation you had with Mr.</p> <p>6 Shaukat regarding her entering the process?</p> <p>7 A. The conversations specifically, no.</p> <p>8 Again, he asked to include her in the process and</p> <p>9 we made that happen.</p> <p>10 Q. Did you understand her to have raised</p> <p>11 her hand to be considered for the position?</p> <p>12 A. I don't recall --</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. I don't recall if she had applied.</p> <p>15 Q. Do you recall being interviewed by</p> <p>16 employee relations in connection with Ms. Rowe?</p> <p>17 A. Whether or not I knew on the outset</p> <p>18 it had to do with Ulku I can't say for sure, but I</p> <p>19 think the content of that conversation centered</p> <p>20 there or as a topic. So, yeah, I do recall</p> <p>21 speaking with employee relations.</p> <p>22 Q. Did you actually get interviewed on</p> <p>23 two occasions by employee relations?</p> <p>24 A. It's possible.</p> <p>25 Q. Do you recall telling employee</p>	<p style="text-align: right;">Page 48</p> <p>1 - STUART VARDAMAN -</p> <p>2 asked us to put her in process.</p> <p>3 Q. Were you surprised that Mr. Shaukat</p> <p>4 was considering someone at a Level 8?</p> <p>5 A. That was my assumption on her level.</p> <p>6 My job is not to be surprised. When my hiring</p> <p>7 manager asks me to involve a Googler in the</p> <p>8 process, I do that.</p> <p>9 Q. Did Mr. Shaukat share with you that</p> <p>10 she was wasn't senior enough for the role, but he</p> <p>11 still wanted you to put her in the process anyway?</p> <p>12 A. Not that I recall.</p> <p>13 MS. GREENE: We have been going about</p> <p>14 an hour, does anyone need a short break?</p> <p>15 Let's take a five-minute break and</p> <p>16 we'll come back and continue on. Our -- our</p> <p>17 videographer will take it off the record.</p> <p>18 MR. GAGE: Okay.</p> <p>19 THE VIDEOGRAPHER: Going off the</p> <p>20 record, the time is 10:41 a.m. New York time.</p> <p>21 (Whereupon, a brief discussion was</p> <p>22 held off record.)</p> <p>23 THE VIDEOGRAPHER: The time is 10:49</p> <p>24 a.m. New York time, we're back on the record.</p> <p>25 Q. Okay. Mr. Vardaman, I would like you</p>
<p style="text-align: right;">Page 47</p> <p>1 - STUART VARDAMAN -</p> <p>2 relation -- employee relations that she may have</p> <p>3 bubbled it up, the position, herself to Tariq?</p> <p>4 A. I don't recall saying that exactly.</p> <p>5 Q. Whether you said that exactly, in sum</p> <p>6 or substance do you recall saying to ER that she</p> <p>7 might have been the one to raise her hand for that</p> <p>8 position?</p> <p>9 A. I -- I really can't say. I don't</p> <p>10 remember the exact context and all the content of</p> <p>11 that discussion.</p> <p>12 Q. Do you recall, putting aside that</p> <p>13 discussion, whether at any point in time you</p> <p>14 learned that Ms. Rowe had raised her hand to be</p> <p>15 considered for the position?</p> <p>16 A. I -- I'm sorry, I'm having trouble</p> <p>17 remembering the detail that you want.</p> <p>18 Q. Do you recall whether you had</p> <p>19 conversations with Ms. Rowe about whether she was</p> <p>20 the one to throw her hat into the ring, so to</p> <p>21 speak?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. No. As I mentioned -- sorry, my</p> <p>24 screen keeps blanking out. As I mentioned, I</p> <p>25 connected with her. I believe it was after Tariq</p>	<p style="text-align: right;">Page 49</p> <p>1 - STUART VARDAMAN -</p> <p>2 to look back at the Box again and you may need to</p> <p>3 refresh.</p> <p>4 A. Okay.</p> <p>5 Q. And we're looking for a document that</p> <p>6 was previously marked as Exhibit 51. Tell me when</p> <p>7 you have that open.</p> <p>8 A. Forgive me. I'm not trying to be</p> <p>9 dense here. What you do you mean previously</p> <p>10 marked as 51? Can you share the whole title.</p> <p>11 Q. It says "Exhibit 51" in the Box.</p> <p>12 A. Okay. Well, I have two 51s in there.</p> <p>13 MR. GAGE: And this one says</p> <p>14 X0051Bern version.</p> <p>15 A. Okay, okay. Okay, I got it.</p> <p>16 MR. GAGE: That just simply means it</p> <p>17 was marked as an exhibit during a prior</p> <p>18 deposition.</p> <p>19 THE WITNESS: Ah. Okay, got it.</p> <p>20 Q. Do you have that document open?</p> <p>21 A. I do.</p> <p>22 Q. Okay. The document you're looking at</p> <p>23 was previously marked as Exhibit 51, Bates stamped</p> <p>24 GOOG-ROWE-00056990 through 014. So if you look at</p> <p>25 this document, in the upper right-hand corner are</p>

<p style="text-align: right;">Page 66</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 A. I do.</p> <p>2 Q. Does that refresh your recollection</p> <p>3 about whether Mr. Stevens was supportive of her</p> <p>4 interviewing for the role?</p> <p>5 A. Honestly, that would have been a</p> <p>6 conclusion that I reached given -- given Eryka's</p> <p>7 e-mail, the previous exhibit.</p> <p>8 Q. At any point in time, did anyone tell</p> <p>9 you that Mr. Stevens was not supportive of her for</p> <p>10 the role?</p> <p>11 A. No.</p> <p>12 Q. Did you discuss that with Mr.</p> <p>13 Shaukat?</p> <p>14 A. Discuss what?</p> <p>15 MR. GAGE: Objection.</p> <p>16 Q. Whether Mr. Stevens was supportive of</p> <p>17 her for the role.</p> <p>18 A. No, that would have been a</p> <p>19 conversation between VPs.</p> <p>20 If, you know, I can shed a little bit</p> <p>21 more light about my intent in these, messages like</p> <p>22 these for candidates both in Goog -- in internal</p> <p>23 and external, it's a -- it's an attempt to help</p> <p>24 the candidates put their best foot forward so that</p> <p>25</p>	<p style="text-align: right;">Page 68</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 had -- had stepped back from the panel interviews</p> <p>2 and -- and so we ultimately landed at the</p> <p>3 panelists that were -- that are listed in -- in</p> <p>4 GHire, I guess.</p> <p>5 Q. Looking again at Exhibit 106 under</p> <p>6 "Impression," the bullet "Impression."</p> <p>7 You write "Executive poise confident,</p> <p>8 but not ego driven, forthright with a quick</p> <p>9 operating cadence." Do you see that?</p> <p>10 A. Yes, I do.</p> <p>11 Q. What was that impression based on?</p> <p>12 A. That would have been my meeting with</p> <p>13 her, the -- the one that I had mentioned was</p> <p>14 probably around 45 minutes. Again, this is my</p> <p>15 attempt in my job to help ensure that candidates</p> <p>16 are -- are putting their best foot forward with</p> <p>17 the information that -- that I tee up panel</p> <p>18 members for. I -- yeah.</p> <p>19 Q. You've only been giving accurate</p> <p>20 information as part of these e-mails, correct?</p> <p>21 A. Yes, for the benefit of the</p> <p>22 candidate. I can tell you that my personal</p> <p>23 impression in my conversation was -- was that I</p> <p>24 was talked down to that I felt as -- as a result</p> <p>25</p>
<p style="text-align: right;">Page 67</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 a panel member could read some of this and say</p> <p>2 okay, I am -- I am interested in meeting this</p> <p>3 candidate and -- and so there -- there's some</p> <p>4 content in there to -- to help, in this case, Ulku</p> <p>5 put her best foot forward.</p> <p>6 Q. Who made the decision about who Mr.</p> <p>7 Rowe's interview panel would be?</p> <p>8 MR. GAGE: Objection.</p> <p>9 A. That would have been a conversation</p> <p>10 likely during one of our meetings between Tariq</p> <p>11 and Fiona O'Donnell at the time. It would have</p> <p>12 been a -- Tariq's business partner -- HR business</p> <p>13 partner, excuse me, and me.</p> <p>14 And, if -- if I can, the -- the</p> <p>15 reason that that's a discussion is because we want</p> <p>16 panel members, A, to be objective, but then, B,</p> <p>17 representative of relationships that a given</p> <p>18 candidate might be expected to work with closely</p> <p>19 for the benefit of our -- of our customers.</p> <p>20 Q. What did you discuss with respect to</p> <p>21 who would be the panel members for Ms. Rowe's</p> <p>22 interview?</p> <p>23 A. I don't recall specifics. As -- as I</p> <p>24 had mentioned in an earlier exhibit, Brian</p> <p>25</p>	<p style="text-align: right;">Page 69</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 of my level.</p> <p>2 Q. What made you feel like you were</p> <p>3 talked down to?</p> <p>4 A. There was a perceptible, perceivable</p> <p>5 annoyance I think with the -- the conversation</p> <p>6 that -- that she had with me.</p> <p>7 Q. And tell me about that.</p> <p>8 A. I felt dismissed at the end of the</p> <p>9 day as a result of my conversation with -- with</p> <p>10 Ulku.</p> <p>11 Q. What did she say that made you feel</p> <p>12 dismissed?</p> <p>13 A. I don't recall specifics.</p> <p>14 Q. What made you say -- what did she say</p> <p>15 that made you perceive that she was annoyed?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. It would have been a combination of</p> <p>18 her -- I -- I think of her demeanor and her -- her</p> <p>19 word choice in that meeting with me, but again the</p> <p>20 specifics I -- I don't recall exactly.</p> <p>21 Q. What about her demeanor?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. Again, the conclusion I felt as a</p> <p>24 result of interacting with her was that I felt</p> <p>25</p>

<p style="text-align: right;">Page 70</p> <p>1 - STUART VARDAMAN -</p> <p>2 dismissed and -- and talked down to I -- I guess</p> <p>3 by the fact I was having and requesting a meeting</p> <p>4 with her to -- to shed light on the process.</p> <p>5 I think it's important to note that</p> <p>6 none of that came out here in this note to Jason</p> <p>7 in advance of the interview prep, hence going back</p> <p>8 to what I said earlier about ensuring that the</p> <p>9 candidates are being presented the best possible</p> <p>10 light.</p> <p>11 Q. I understand how you felt leaving</p> <p>12 that meeting. Now I want you to explain to me</p> <p>13 what she did or what she said that led you to feel</p> <p>14 that way.</p> <p>15 MR. GAGE: Objection. Asked and</p> <p>16 answered.</p> <p>17 A. Again I -- I can't recall the</p> <p>18 specifics, ma'am. There is an aspect of being</p> <p>19 successful at Google, which is this notion of</p> <p>20 Googleness, and part of that is encapsulated</p> <p>21 with openly and actively working across the</p> <p>22 organization regardless of level, sometimes L 2s.</p> <p>23 And, again, my impression/feeling after my</p> <p>24 conversation with Ulku was that I was dismissed</p> <p>25 and be -- because of level.</p>	<p style="text-align: right;">Page 72</p> <p>1 - STUART VARDAMAN -</p> <p>2 no, ma'am. I mean, we're -- we're getting back to</p> <p>3 2018 here and -- and I'm -- you know, I -- I just</p> <p>4 -- just don't -- don't recall the specifics.</p> <p>5 Q. Do you recall whether she was unhappy</p> <p>6 with the process as opposed to being unhappy with</p> <p>7 you?</p> <p>8 A. No. I -- I don't recall the -- any</p> <p>9 -- any difference there. If I were in her shoes,</p> <p>10 I would have been excited to run the process.</p> <p>11 Q. Did Mr. Shaukat interview her for the</p> <p>12 role?</p> <p>13 A. It depends on what you mean by</p> <p>14 "interview." I don't -- I don't know if there's a</p> <p>15 specific meeting document in GHire.</p> <p>16 Q. Do you know if at any point in time</p> <p>17 he met with her to discuss her qualifications for</p> <p>18 the role?</p> <p>19 A. No, ma'am, I don't have insight into</p> <p>20 that meeting.</p> <p>21 Q. Do you know if that meeting ever took</p> <p>22 place?</p> <p>23 A. No, ma'am, I really don't.</p> <p>24 Q. Would -- you described for me as a --</p> <p>25 as a point in the process that Mr. Shaukat would</p>
<p style="text-align: right;">Page 71</p> <p>1 - STUART VARDAMAN -</p> <p>2 Q. What was the last thing, because of</p> <p>3 what?</p> <p>4 A. Because of my level, being an L 6 and</p> <p>5 being involved in this process as -- as</p> <p>6 essentially the facilitator of -- of the process</p> <p>7 we were running.</p> <p>8 Q. Did she know your level?</p> <p>9 A. I don't know.</p> <p>10 Q. Did you do anything to document your</p> <p>11 impressions leaving that meeting?</p> <p>12 A. I don't think so, no.</p> <p>13 Q. Did you share those impressions with</p> <p>14 anyone?</p> <p>15 A. No, it's not my job.</p> <p>16 Q. In that meeting, did Ms. Rowe express</p> <p>17 any frustration that she had not been contacted</p> <p>18 before about the position?</p> <p>19 A. Not that I recall, no, ma'am.</p> <p>20 Q. Do you recall her again noting</p> <p>21 that -- or alluding to your recruiting process</p> <p>22 when she joined and that she thought OCTO group</p> <p>23 was a holding place until verticalization?</p> <p>24 A. Verticalization, this stuff on the</p> <p>25 last couple of docu -- or couple of exhibits ago,</p>	<p style="text-align: right;">Page 73</p> <p>1 - STUART VARDAMAN -</p> <p>2 meet with candidates. Do you know whether he did</p> <p>3 that with Ms. Rowe?</p> <p>4 A. I don't. What I was describing there</p> <p>5 was largely for external candidates.</p> <p>6 Q. Did Mr. Shaukat ever share feedback</p> <p>7 with respect to his view of her qualifications for</p> <p>8 the role?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. His view -- I'm sorry?</p> <p>11 Q. Did Mr. Shaukat --</p> <p>12 A. His view on who? I'm sorry.</p> <p>13 Q. I'll re-ask the question. Did Mr.</p> <p>14 Shaukat ever share with you his view of Ms. Rowe's</p> <p>15 qualifications for her consideration for the --</p> <p>16 the head of financial services role?</p> <p>17 A. No, ma'am.</p> <p>18 Q. Did you ever ask him for</p> <p>19 documentation related to his view of her</p> <p>20 qualifications for that role?</p> <p>21 A. No, ma'am. Again, he -- he asked me</p> <p>22 to involve her in the process and because she's a</p> <p>23 Googler, that's -- largely how the process</p> <p>24 manifested for Ulku is exactly what we would have</p> <p>25 done for -- for a Googler whom Tariq wanted to</p>

<p style="text-align: right;">Page 98</p> <p>1 - STUART VARDAMAN -</p> <p>2 (The question and answer requested</p> <p>3 was read back by the reporter.)</p> <p>4 MR. GAGE: Yeah, I thought there was</p> <p>5 more to his answer because I got bits and</p> <p>6 pieces of kind of a clipped response on the</p> <p>7 video as it froze.</p> <p>8 Q. So let me ask the question again --</p> <p>9 A. Okay.</p> <p>10 Q. -- and we can go through. Who made</p> <p>11 the decision that she was not viable for the role?</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. What I captured there is not a</p> <p>14 decision and that must have been referencing the</p> <p>15 information I'd received from Darryl and Jason.</p> <p>16 Q. So this was your -- this was</p> <p>17 reflecting your impression based on what you heard</p> <p>18 from Darryl and Jason?</p> <p>19 A. Yeah, most likely.</p> <p>20 Q. And what you heard from them came in</p> <p>21 the form of a ping; is that right?</p> <p>22 A. That is correct.</p> <p>23 Q. Okay. We're going to go down again.</p> <p>24 Give me a minute, I might be able to tell what you</p> <p>25 page.</p>	<p style="text-align: right;">Page 100</p> <p>1 - STUART VARDAMAN -</p> <p>2 looks like he had some questions on her ability to</p> <p>3 spur followership.</p> <p>4 Q. Did he share anything more with you?</p> <p>5 A. No, ma'am, not that I recall.</p> <p>6 Q. Okay. We're going to go down again</p> <p>7 to Page 117, the page Bates stamped 838 and you</p> <p>8 see this is August 10th, 2018?</p> <p>9 A. Yes.</p> <p>10 Q. And --</p> <p>11 MR. GAGE: I'm sorry, 8 -- 830 what?</p> <p>12 MS. GREENE: 838. 8-3-8.</p> <p>13 MR. GAGE: Oh, okay. I thought you</p> <p>14 said 113.</p> <p>15 MS. GREENE: 117 is the PDF number.</p> <p>16 MR. GAGE: All right.</p> <p>17 Q. And if you turn to the next page and</p> <p>18 look at the entry for Ms. Rowe, "This is awaiting</p> <p>19 complete feedback. Met with Sebastian, 8/2.</p> <p>20 Darryl, Jason, Vats, 8/8. Vats liked her. Darryl</p> <p>21 liked her. Had some questions followership." Do</p> <p>22 you see that?</p> <p>23 A. I do.</p> <p>24 Q. So this is approximately two days</p> <p>25 after those -- the interview completed, correct?</p>
<p style="text-align: right;">Page 99</p> <p>1 - STUART VARDAMAN -</p> <p>2 Okay. We're going to Page 104 in the</p> <p>3 PDF which is Bates Page 825 and you might need to</p> <p>4 look to the prior page to see the date, this is</p> <p>5 August 24th, 2018. Do you see that?</p> <p>6 A. I do.</p> <p>7 Q. Okay. Then going down to the entry</p> <p>8 for Ulku Rowe it says "Chasing feedback" and does</p> <p>9 that indicate as of August 24th you were still</p> <p>10 chasing feedback?</p> <p>11 A. In the system, yes.</p> <p>12 Q. It says "Met with Sebastian 8/2,</p> <p>13 Darryl, Jason, Vats 8/8. Vats liked her. Darryl</p> <p>14 liked her. Had some questions followership." Do</p> <p>15 you see that?</p> <p>16 A. I do.</p> <p>17 Q. Does this reflect what had been</p> <p>18 communicated to you by Vats and Darryl?</p> <p>19 A. Yeah, must have. Yeah, because I</p> <p>20 wrote it.</p> <p>21 Q. Do you recall Darryl saying he liked</p> <p>22 her?</p> <p>23 A. I don't, but I think as a -- as a</p> <p>24 matter of practice I would have captured the</p> <p>25 sentiment and it -- and, as you can see here, it</p>	<p style="text-align: right;">Page 101</p> <p>1 - STUART VARDAMAN -</p> <p>2 A. 8/8 and this is 8/10, yes.</p> <p>3 Q. So between 8/10 -- well, at any point</p> <p>4 after 8/10, did you receive any other feedback</p> <p>5 with respect to Ms. Rowe?</p> <p>6 A. I -- I really don't remember. It's a</p> <p>7 flurry of activities to get people to enter their</p> <p>8 feedback into GHire.</p> <p>9 Q. If you had received additional --</p> <p>10 well, let me ask you this. With respect to the</p> <p>11 feedback that you did receive from Mr. Willis, is</p> <p>12 it reflected here in this entry?</p> <p>13 A. Yeah, I think so.</p> <p>14 Q. Is there any reason why you did not</p> <p>15 include feedback that you had received from Mr.</p> <p>16 Martin in this entry?</p> <p>17 A. I may not have been able to get any.</p> <p>18 Q. And so your understanding was that at</p> <p>19 least two of the people that she interviewed with</p> <p>20 liked her, correct?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. From their perspective, that</p> <p>23 was what I had received. If I translated it here,</p> <p>24 there's considerable nuance beneath that which is</p> <p>25 why I was orienting people toward the entering</p>

<p style="text-align: right;">Page 106</p> <p>1 - STUART VARDAMAN -</p> <p>2 (Whereupon, Exhibit 111 was marked at</p> <p>3 this time.)</p> <p>4 Q. Do you recognize this as a</p> <p>5 communication from yourself dated 12 November,</p> <p>6 2018?</p> <p>7 A. I do.</p> <p>8 Q. And who is Dave Beuerlein?</p> <p>9 A. Dave Beuerlein was the leader, the</p> <p>10 director of the organization I mentioned earlier</p> <p>11 that I was a part of, the kind of broader LST</p> <p>12 group that worked across the various product</p> <p>13 areas.</p> <p>14 Q. Do you see where it says "VP</p> <p>15 Financial Services"?</p> <p>16 A. Yes, I do.</p> <p>17 Q. Is that referring to the head of</p> <p>18 financial services role?</p> <p>19 A. I think so, yes.</p> <p>20 Q. And it says "Two finalists: [REDACTED]</p> <p>21 [REDACTED] and [REDACTED] external.</p> <p>22 Both candidates have completed all stages in the</p> <p>23 process. [REDACTED] met Diane Greene on 10/11 and we</p> <p>24 have been in a holding pattern since then. The</p> <p>25 next step would be to choose the candidate and</p>	<p style="text-align: right;">Page 108</p> <p>1 - STUART VARDAMAN -</p> <p>2 Q. So is it your testimony that she was</p> <p>3 not rejected for the role?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. As I recall, Tariq was going to</p> <p>6 circle back with her and let her know where things</p> <p>7 landed with Thomas Kurian joining and -- and</p> <p>8 ultimately the cancelation.</p> <p>9 Q. So, again, is it your testimony that</p> <p>10 she was not suggested for the role, that the role</p> <p>11 closed before there had been a determination with</p> <p>12 respect to Ms. Rowe; is that your testimony?</p> <p>13 A. Correct --</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. -- the role closed.</p> <p>16 Q. Did Mr. Shaukat tell you that he had</p> <p>17 received a communication from Ms. Rowe saying that</p> <p>18 she thought she was more qualified than the two</p> <p>19 finalists?</p> <p>20 A. No.</p> <p>21 Q. Did Mr. Shaukat tell you that she had</p> <p>22 told him that she thought he should just give her</p> <p>23 the role?</p> <p>24 A. No, I don't recall that.</p> <p>25 Q. Did Mr. Shaukat tell you that she had</p>
<p style="text-align: right;">Page 107</p> <p>1 - STUART VARDAMAN -</p> <p>2 begin the packet process." Do you see that?</p> <p>3 A. I do.</p> <p>4 Q. As of November 12th then, had it been</p> <p>5 determined that the two finalists for the position</p> <p>6 were [REDACTED] and [REDACTED]?</p> <p>7 A. No, honestly that looks like an</p> <p>8 oversight on my part.</p> <p>9 Q. That you did not know?</p> <p>10 A. Correct, and Dave -- or in my email</p> <p>11 to Dave, I reference the -- the ping</p> <p>12 conversation. I'm not sure what the context of</p> <p>13 that -- or I don't recall what the context of that</p> <p>14 ping conversation was.</p> <p>15 Q. But here you don't make any mention</p> <p>16 of Ms. Rowe as a finalist for the position,</p> <p>17 correct?</p> <p>18 A. That is correct.</p> <p>19 Q. At any point in time was a</p> <p>20 determination made, that you know of, that Ms.</p> <p>21 Rowe was not a candidate anymore for the position?</p> <p>22 A. No.</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. Again, the -- the search concluded</p> <p>25 being canceled with no candidate being selected.</p>	<p style="text-align: right;">Page 109</p> <p>1 - STUART VARDAMAN -</p> <p>2 raised a concern about discrimination?</p> <p>3 A. No, ma'am.</p> <p>4 Q. Did he tell you that she had raised a</p> <p>5 concern about her levelling?</p> <p>6 A. No.</p> <p>7 Q. Did he tell you that she had raised</p> <p>8 a concern that her initial leveling was</p> <p>9 under-leveled and that was impacting her</p> <p>10 consideration for the VP position?</p> <p>11 A. For the lead financial services</p> <p>12 position, no, not that I recall. Tariq typically</p> <p>13 didn't share such -- such things, even if he would</p> <p>14 have insight into them.</p> <p>15 Q. Did Mr. Shaukat tell you that ER was</p> <p>16 looking into concerns that Ms. Rowe had raised?</p> <p>17 A. Not that I recall, no.</p> <p>18 Q. Did Mr. Shaukat tell you that he was</p> <p>19 concerned that she might leave Google?</p> <p>20 A. Not that I recall, no.</p> <p>21 Q. Did you form your own opinion about</p> <p>22 Ms. Rowe as a candidate for the VP of financial</p> <p>23 services position?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. My opinion, given she was a Googler,</p>